2 3 4 5 6 7 8 9	RYAN M. LAPINE, ESQ. (Cal. Bar No. 239316 rlapine@rmslaw.com LUKE D. LIEBERMAN, ESQ. (Cal. Bar No. 28 llieberman@rmslaw.com JOSHUA H. HERR, ESQ. (Cal. Bar. No. 301775 jherr@rmslaw.com ROSENFELD, MEYER & SUSMAN LLP 232 North Canon Drive Beverly Hills, California 90210-5302 Telephone: (310) 858-7700 Facsimile: (310) 860-2430 RANDY M. HESS (SBN 88635) rhess@ahk-law.com PAMELA A. BOWER (SBN 151701) pbower@ahk-law.com ADLESON, HESS & KELLY A Professional Corporation 577 Salmar Avenue, Second Floor Campbell, California 95008 Telephone: (408) 341-0234 Facsimile: (408) 341-0250 Attorneys for Plaintiff DOUBLEVISION ENTERTAINMENT, LLC UNITED STATES	4572)
15	NORTHERN DISTRICT OF CALIFORNIA	
	DOUBLEVISION ENTERTAINMENT, LLC,) a Tennessee limited liability company, as	
19 20 21 22 23 24 25 26	assignee of Commercial Escrow Services, Inc, a California corporation, and Antoinette Hardstone, an individual, Plaintiff, v. NAVIGATORS SPECIALTY INSURANCE COMPANY; a New York corporation; THE NAVIGATORS GROUP, INC., a New York corporation; and DOES 1 through 50, inclusive, Defendants.	HESS IN SUPPORT OF PLAINTIFF DOUBLEVISION ENTERTAINMENT, LLC'S REPLY BRIEF IN SUPPORT OF ITS MOTION FOR SANCTIONS IN THE AMOUNT OF \$282,672.82 PURSUANT TO FRCP 37(c)(2)
18 19 20 21 22	a California corporation, and Antoinette Hardstone, an individual, Plaintiff, v. NAVIGATORS SPECIALTY INSURANCE COMPANY; a New York corporation; THE NAVIGATORS GROUP, INC., a New York corporation; and DOES 1 through 50, inclusive, Defendants.	HESS IN SUPPORT OF PLAINTIFF DOUBLEVISION ENTERTAINMENT, LLC'S REPLY BRIEF IN SUPPORT OF ITS MOTION FOR SANCTIONS IN THE AMOUNT OF \$282,672.82 PURSUANT TO

LAW OFFICES

ROSENFELD,
MEYER &
SUSMAN LLP

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foregoing is true and correct.

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DECLARATION OF NICOLE ADAMS-HESS

I am an attorney duly admitted to practice before this Court and am counsel of

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I, NICOLE ADAMS-HESS, ESQ., declare as follows:

record for plaintiff Doublevision Entertainment, LLC ("Doublevision"). I have personal 5

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knowledge of the facts set forth in this Declaration and, if called as a witness, could and would testify competently to such facts under oath. I make this Declaration in support of Doublevision Entertainment, LLC's Reply Brief In Support of Its Motion For Sanctions In The Amount Of \$282,672.82 Pursuant To FRCP 37(c)(2). As of September 9, 2015, my firm, Adleson, Hess & Kelly, PC has billed a total of 2.

Exhibit "A" is a true and correct copy of a billing report reflecting that total. I declare under penalty of perjury under the laws of the State of California that the

1,143.15 hours representing Doublevision in the above-captioned matter. Attached hereto as

Executed on $9 - 10^{-1}$ at Campbell, California.

LAW OFFICES

ROSENFELD, MEYER & SUSMAN LLP

EXHIBIT A

Adleson, Hess & Kelly Fees Billing Summary January 9, 2014 to September 9, 2015

Client: Doublevision Entertainment, LLC

Billed Hours: 1143.15

Billed Amount: \$469,516.75